

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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420 Lexington Avenue • Suite 2525 • New York, New York 10170  
T: 212.792-0048 • E: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

December 10, 2020

**Via Electronic Filing & Email**

The Honorable Judge Edgardo Ramos  
U.S. District Court Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Ortiz Ochoa et al v. Prince Deli Grocery Corp. et al*  
**Case No.: 18-cv-09417-ER**

Dear Honorable Judge Ramos:

This law firm represents Defendants Prince Deli Grocery Corp. (d/b/a Prince Deli Grocery) and Abdo S. Anam (a/k/a Abdo Saleh) (together, the “Defendants”) in the above-referenced action.

Pursuant to Rule 1(E) of Your Honor’s Individual Motion Practices, this letter respectfully serves as a request to extend the fact discovery completion deadline & non-expert deposition completion deadline from January 18, 2021, to through and including, March 4, 2021.

This is the fifth request of its nature. This request is made on consent of Plaintiff. If granted, this request would affect the case management conference currently scheduled for January 18, 2021 at 11:30 a.m. Thus, this application also requests an adjournment of the January 18, 2021 case management conference to a date and time set by the Court after March 4, 2021.

There are extenuating circumstances surrounding this request. Specifically, [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED].<sup>1</sup> Thus, an extension of the discovery completion deadline is necessary in order for Defendants’ counsel to continue to meaningfully defend this action, and satisfy its other, conflicting obligations before this Honorable Court.

Thus, Defendants respectfully request that: (i) the fact discovery completion deadline & non-expert deposition completion deadline be extended from January 18, 2021, to through and including, March 4, 2021; and (ii) the January 18, 2021 case management conference be adjourned to a date and time set by the Court after March 4, 2021.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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<sup>1</sup> In light of the sensitive nature of this request, a redacted version of this letter is being filed on ECF. Simultaneously with the filing of this letter, an unredacted copy of this letter has been emailed to all counsel of record, and to Chambers.

Jason Mizrahi  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Tel. No.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Defendants*

VIA ECF: All Counsel